



Memorandum from the Office of the Inspector General

March 30, 2023

Megan T. Flynn

REQUEST FOR FINAL ACTION – EVALUATION 2022-17375 – TVA TRAINING AND DEVELOPMENT PROCESSES

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Lindsay J. Denny, Director, Evaluations, at (865) 633-7349. We appreciate the courtesy and cooperation received from your staff during the evaluation.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)

LJD:FAJ

Attachment

cc (Attachment):

TVA Board of Directors
Megan Andersen
Jaime E. Choate
Susan E. Collins
Buddy Eller
David B. Fountain
Jim R. Hopson
Jeffrey J. Lyash
Jill M. Matthews
Ben R. Wagner
OIG File No. 2022-17375



Office of the Inspector General

Evaluation Report

To the Vice President,
Talent, Culture, and Chief
Diversity and Inclusion
Officer

TVA TRAINING AND DEVELOPMENT PROCESSES

Evaluation Auditor
Lindsay J. Denny

Evaluation 2022-17375
March 30, 2023

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MEMORANDUM DATED MARCH 22, 2023, FROM MEGAN T. FLYNN TO
DAVID WHEELER



Evaluation 2022-17375 – TVA Training and Development Processes

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

The Government Accountability Office (GAO) defines training as educational programs of instruction in professional, technical, or other fields that are, or will be, related to the employee's job responsibilities. The Tennessee Valley Authority's (TVA) Regulatory and Corporate Training and Support organization aims to (1) create and maintain safety and environmental training that ensures employees are trained to regulatory requirements, (2) support the job assessment process to ensure employees are assigned the training they need to perform their jobs, and (3) create and support the corporate and technical training that enables individual professional and technical development.

Due to the importance of training and development programs in contributing to improved organizational performance and enhanced employee skills and competencies, we conducted an evaluation of TVA's training and development processes.

What the OIG Found

We found the process for identifying training needs was generally effective; however, we found some of TVA's training processes were not effective and needed improvement. Specifically, we found (1) not all individuals were assigned the appropriate training, and (2) the effectiveness of training was not always being measured.

What the OIG Recommends

We recommend the Vice President, Talent, Culture, and Chief Diversity and Inclusion Officer, address issues related to training assignments and measuring training effectiveness. Our detailed recommendations are listed in the body of this report.

TVA Management's Comments

In response to the draft report, TVA management agreed with our recommendations and provided ongoing and completed actions to address the recommendation. See the Appendix for management's complete response.

Auditor's Comments

We agree with TVA management's planned and completed actions in response to our recommendations.

BACKGROUND

The Government Accountability Office (GAO) defines training as educational programs of instruction in professional, technical, or other fields that are, or will be, related to the employee's job responsibilities. According to GAO's *A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*,¹ the essential aim of training and development programs is to assist the agency in achieving its mission and goals by improving individual and organizational performance.

The Tennessee Valley Authority's (TVA) Regulatory and Corporate Training and Support (Training) organization administers training related to safety, environmental, and emergency response. This organization aims to (1) create and maintain safety and environmental training that ensures employees are trained to regulatory requirements, (2) support the job assessment process to ensure employees are assigned the training they need to perform their jobs, and (3) create and support the corporate and technical training that enables individual professional and technical development.

According to Training personnel, training assignments are primarily made based on an employee's job code. When a job code is created, the manager of the position performs an assessment of the position's responsibilities, which informs Training of the appropriate courses to assign to that job code. When an individual is hired, the system automatically assigns the training required for that job code.

Training evaluation involves assessing the extent to which training and development efforts contribute to improved performance and results. As part of TVA Standard Programs and Processes (SPP) 17.006, *Training Evaluation Phase*, Training professionals are responsible for gathering performance data (metrics, performance indicators, customer feedback, self-assessments, etc.). The SPP also states that they review and summarize training and trainee feedback to determine appropriate actions and responses.

Due to the importance of training and development programs in contributing to improved organizational performance and enhanced employee skills and competencies, we conducted an evaluation of TVA's training and development processes.

¹ GAO, *A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, GAO-04-546G (Washington, D.C., March 2004).

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of our evaluation was to evaluate TVA's process for (1) identifying training needs, (2) assigning individuals the appropriate training, and (3) measuring the effectiveness of training provided. The scope of the evaluation included regulatory training. To achieve our objective, we:

- Interviewed TVA Training personnel to determine the process performed to assign training to individuals, to incorporate new training needs, and to evaluate the overall effectiveness of training activities.
- Reviewed the following documents:
 - TVA-SPP-17.000, *Training*
 - TVA-SPP-17.002, *Training Analysis Phase*
 - TVA-SPP-17.003, *Training Design Phase*
 - TVA-SPP-17.004, *Training Development Phase*
 - TVA-SPP-17.005, *Training Implementation Phase*
 - TVA-SPP-17.006, *Training Evaluation Phase*
 - *A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, GAO
- Reviewed assessments performed for new job codes created from September 1, 2021, through August 31, 2022, to determine if the individuals in these job codes were assigned the appropriate training.
- Reviewed new hires from September 1, 2021, through August 31, 2022, to identify the 10 job codes most frequently assigned to new employees. Reviewed the training assigned to the 141 individuals hired into these job codes to determine if the appropriate training was assigned to each individual.

This evaluation was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

FINDINGS

We found the process for identifying training needs was generally effective; however, we found some of TVA's training processes were not effective and needed improvement. Specifically, we found (1) not all individuals were assigned the appropriate training, and (2) the effectiveness of training was not always being measured.

THE PROCESS FOR IDENTIFYING TRAINING NEEDS WAS GENERALLY EFFECTIVE

According to TVA-SPP-17.002, *Training Analysis Phase*, subject matter experts review course material to identify gaps. Training course content is reviewed on a 4-year review cycle, at a minimum. We reviewed an example of a recently reviewed training course with input and changes provided to TVA Training from the subject matter expert. In addition, TVA-SPP-17.004, *Training Development Phase*, includes instruction to review operating experiences for inclusion into training materials. For example, a recent update was made to the all-terrain vehicle training course to include utility vehicles, based on a utility vehicle rollover incident.

In addition, according to TVA Training personnel, the process for identifying changes to federal regulations for safety related training is done through the policy and procedure subcommittee for the Agency Health and Safety Committee. Training personnel also participate in the safety peer team and environmental meetings and are part of the safety procedure revision/change management process flow.

NOT ALL INDIVIDUALS WERE ASSIGNED THE APPROPRIATE TRAINING

As mentioned previously, training is primarily assigned based on job codes. However, our testing identified individuals who were not assigned the appropriate training for their job code. We tested the training for all new hires assigned to the 10 most frequently used job codes from September 1, 2021, through August 31, 2022. Our testing identified discrepancies in training for 6 of the 10 job codes, including the following:

- Twenty-eight individuals (3 of the 10 job codes reviewed) were not assigned the appropriate training due to a gap identified in TVA's Learning Management System. This gap affected individuals who were terminated and rehired into the same job code. TVA Training stated this often occurs when a contract employee is terminated and hired at another TVA site. When an employee is terminated, the system removes all training assignments, but when the individual is rehired into the same job code, training is not reassigned. TVA Training performed searches to identify other employees, outside our testing, who may have been impacted by this issue and identified 276 employees. According to TVA Training, appropriate training has now been assigned to all identified employees. Additionally, a new process is being implemented that changes the job code for all terminated employees, prompting the system to assign the appropriate training upon rehire.
- Two job codes did not include a course that should have been included. This impacted 24 individuals who had not been assigned the course.
- One job code included an employee who had not been assigned four required courses.

Additionally, we tested new job codes that included safety and environmental training courses developed from September 1, 2021, through August 31, 2022, and identified discrepancies in 3 of the 56 new job code assessments. Specifically, we found (1) 2 job codes had not been assigned all appropriate courses, resulting in 3 employees who had not been assigned one to two courses each and (2) 1 employee who had not been assigned one course, even though it had been assigned to the job code.

According to TVA Training, most training assignment discrepancies were corrected during the course of our evaluation.

THE EFFECTIVENESS OF REGULATORY TRAINING WAS NOT ALWAYS BEING MEASURED

According to GAO's *A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, "Agencies need credible information on how training and development programs affect organizational performance." TVA-SPP-17.006, *Training Evaluation Phase*, requires steps to (1) review and summarize training and trainee feedback to determine appropriate actions and responses and (2) gather performance data (metrics, performance indicators, customer feedback, self-assessments, etc.). However, we found TVA is not always completing steps to measure the effectiveness of regulatory training.

We requested training and trainee feedback for safety and environmental courses, and were provided a single example of feedback provided by the functional owner of a course. According to TVA Training personnel, course feedback surveys are no longer assigned for all safety and environmental courses, but generally are for new or recently changed courses. We also requested performance data gathered and reviewed by Training personnel and were informed safety and environmental performance data is gathered and monitored by the responsible organizations, which is not included as an alternative in the SPP. Without measuring the effectiveness of training, there is risk that training programs are not having the intended impact on individual and organizational performance.

RECOMMENDATIONS

We recommend the Vice President, Talent, Culture, and Chief Diversity and Inclusion Officer:

- Confirm the course assignment discrepancies identified have been corrected for all impacted employees.

TVA Management's Comments – TVA management agreed with the recommendation and described actions they have completed, manually and through coding, to identify employees who were missing training and assign it in the system.

Auditor Response – We concur with TVA's completed actions.

- Complete implementation of the planned training system correction to change the job codes for all terminated employees.

TVA Management's Comments – TVA management agreed with the recommendation and stated they have coordinated with Human Resources to place all terminated employees into a dummy job code, so the job code must change upon rehire.

Auditor Response – We concur with TVA's completed actions.

- Perform evaluation process steps in compliance with TVA-SPP-17.006, *Training Evaluation Phase*.

TVA Management's Comments – TVA management agreed with the recommendation and stated they plan to (1) coordinate discussions with the safety organization around training effectiveness and utilizing data to drive effectiveness reviews and (2) review and update TVA-SPP-17.006, *Training Evaluation Phase*, to reflect recommendation comments.

Auditor Response – We concur with TVA's planned actions.



1101 Market Street, Chattanooga, Tennessee 37402

March 22, 2023

David Wheeler – WT 2C-K

David,

Thank you for the opportunity to review and address the recommendations in **Draft Evaluation 2022-17375 – TVA Training and Development Processes**. We have reviewed the report and agree with the recommendations provided. Our detailed response to each recommendation is included below.

OIG Recommendation 1: Confirm the course assignment discrepancies identified have been corrected for all impacted employees.

Response: We agree with the recommendation and consider this complete based on the following actions:

- In efforts to find the highest potential impact, a list of all TVA Employees & Contractors were gathered and converted into a pivot table that show the number of employees in each job code (this allowed us to eliminate all the job codes that were not assigned)
- During the process of determining how the error was occurring, it was found that the "UserSummaryDataAudit" report would identify employees that had been terminated, rehired, and what their job code was for both occasions.
- Code was written in "Visual Basic" that would search through the report and find every employee that had been terminated and hired back into the same job code, then export those employees to a list generated as output if they were still in that job code. A second version of the code was written that excluded the "still in the same job code" requirement to allow for running reports over ranges of job codes to speed up the process once the higher population job codes were complete.
- Once the output file was complete, each person remaining on the list was looked up manually and the "add job code assignments" button applied. If any training was added, it was logged on the output sheet.

OIG Recommendation 2: Complete implementation of the planned training system correction to change the job codes for all terminated employees.

Response: We agree with the recommendation and consider this complete based on the following actions:

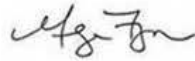
- Technical Training coordinated with Human Resources to have everyone who is terminated placed into a dummy job code, so they must change job codes when rehired.

OIG Recommendation 3: Perform evaluation process steps in compliance with TVA-SPP-17.006, *Training Evaluation Phase*.

Response: We agree with the recommendation and will take the following actions:

- Technical Training will coordinate discussions with the safety organization around training effectiveness and utilizing data to drive effectiveness reviews.
- Technical Training will review and update TVA-SPP-17.006, *Training Evaluation Phase*, to reflect recommendation comments. This action will be complete by March 31, 2024.

Thank you again for the opportunity to review and partner with your team through this process. If you have any further questions, please don't hesitate to reach out.



Megan T. Flynn
Vice President, Talent, Culture and Chief Diversity & Inclusion Officer
LP 3A-C

cc: David Fountain
Sue Collins
Megan Andersen
OIG File No. 2022-17375